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13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 UNITED STATES OF AMERICA,

16 Case No. 2:16-mj-620-PAL

17 Plaintiff,

18 **STIPULATION TO CONTINUE**
PRELIMINARY HEARING

19 v.

20 (Fourth Request)

21 JASON BROTHERTON,

22 Defendant.

23 IT IS HEREBY STIPULATED AND AGREED, by and between Steven W. Myhre,
24 Acting United States Attorney, and Elham Roohani, Assistant United States Attorney, counsel
25 for the United States of America, and Rene L. Valladares, Federal Public Defender, and Raquel
26 Lazo, Assistant Federal Public Defender, counsel for Jason Brotherton, that the Preliminary
Hearing currently scheduled on May 25, 2017 at 4:00 p.m., be vacated and continued to a date
and time convenient to the Court, but no sooner than ninety (90) days.

27 This Stipulation is entered into for the following reasons:

28 1. The parties have been actively working to reach a pre-indictment resolution.
29 However, negotiations stalled when government counsel went on maternity leave. The parties
30 expect that negotiations will resume upon government counsel's return to the office next month.

1 The parties are hopeful that they will reach a resolution and no further continuances will be
2 necessary.

3 2. Defendant is not incarcerated and does not object to a continuance.
4 3. Additionally, denial of this request for continuance could result in a miscarriage
5 of justice.

6 This is the fourth request for continuance filed herein.

7 DATED this 17th day of May, 2017.

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9 RENE L. VALLADARES
Federal Public Defender

STEVEN W. MYHRE
Acting United States Attorney

10
11 /s/ *Raquel Lazo*
By _____
12 RAQUEL LAZO
13 Assistant Federal Public Defender

/s/ *Elham Roohani*
By _____
ELHAM ROOHANI
14 Assistant United States Attorney
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
JASON BROTHERTON,
Defendant.

Case No. 2:16-mj-620-PAL

ORDER

V.

JASON BROTHERTON,
Defendant.

IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on May 25, 2017 at the hour of 4:00 p.m., be vacated and continued to August 23, 2017 at the hour of 4:00 p.m.

IT IS FURTHER ORDERED that no further extensions will be allowed.

DATED this 19th day of May, 2017.

Terry A. Teer
UNITED STATES MAGISTRATE JUDGE